

September 13, 2022

VIA ECF AND EMAIL

Honorable Christine M. Gravelle
United States Bankruptcy Court
402 East State Street
Trenton, New Jersey 08608
Chambers_of_cmg@njb.uscourts.gov

Re: *In re Varun Malik*
Case No. 22-11708
Glenwood Office Furniture II and Swati Bhatheja – Discovery

Dear Judge Gravelle:

This firm represents non-parties Glenwood Office Furniture II (“Glenwood”) and Swati Bhatheja (“Swati”) in connection with the above-referenced matter. I am writing in response to the September 12, 2022 letter from Fulton Bank, N.A. (“Fulton”), and to update the Court with respect to Glenwood’s and Swati’s compliance with the August 29, 2022 Discovery Order (the “Discovery Order”).

Glenwood provided a supplemental document production to Fulton today, which included responsive email communications. The Verizon records previously produced contained information about responsive text messages, but Verizon could not provide the content of those messages, and Glenwood’s principal Ravi Uppal was unable to access them. Glenwood has now produced all responsive documents, provided dates for Mr. Uppal’s deposition, and is in full compliance with the Discovery Order.

With respect to Swati, I did not realize at the time of the August 23 hearing that she was and remains in India, and that she does not currently have a date to return to the United States. Her presence there has made it difficult for Swati to compile the responsive documents and get them to our firm. But, she is taking seriously her obligations to this Court and fully intends to comply

Hon. Christine M. Gravelle

September 13, 2022

Page 2

with the Discovery Order. We therefore respectfully request that the Court deny Fulton's request for sanctions and provide Swati with additional time to comply with the Discovery Order in light of the fact that she is out of the country.

Respectfully submitted,

/s/ Paul S. Doherty, III

Paul S. Doherty III, Esq.

cc: All counsel (via ECF)